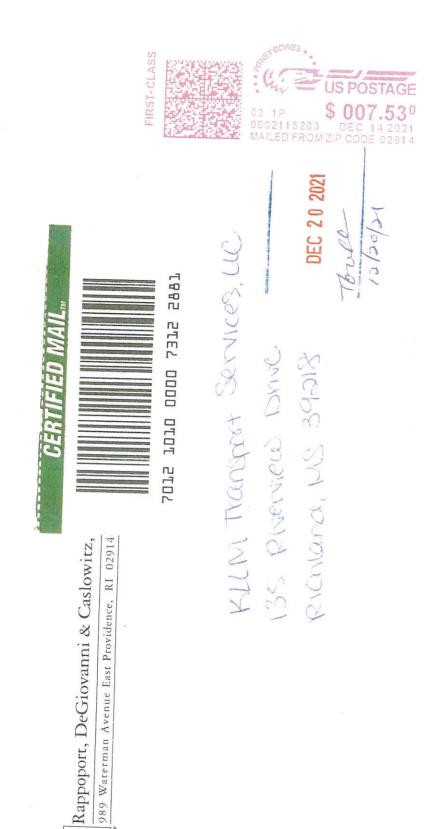
# EXHIBIT A





## Rappoport, DeGiovanni & Caslowitz, Inc.

989 Waterman Avenue, East Providence, Rhode Island 02914-1314

(401) 437-3000

\*Also Member Massachusetts Bar

76 mehe

Stephen M. Rappoport\*
Jack R. DeGiovanni, Jr.\*
Andrew S. Caslowitz

Michael J. Farley\*

December 14, 2021

DEC 20 2021

KLLM Transport Services, LLC 135 Riverview Drive Richland, MS 39218

Re: Walter Machado et al. v. Jeremy Wood et al.

Dear KLLM Transport Services, LLC:

Please be advised that this correspondence and the related enclosures are being sent as notice of service, pursuant to Rhode Island General Laws 31-7-7.

Pursuant to the above referenced statute, enclosed please find a copy of the Complaint, Jury Trial Demand and a Summons with Proof of Service upon the Administrator of the Division of Motor Vehicles the above referenced lawsuit.

Very truly yours,

Stephen M. Rappoport

Stephen M. Rappoport, Esq.

SMR/hng

Enclosures

Via certified mail/return receipt requested: 7012 1010 0000 7312 2881



### STATE OF RHODE ISLAND SUPERIOR COURT

#### **SUMMONS**

Plaintiff Walter Machado et al. v. Jeremy Wood et al. Defendant	Civil Action File Number PC-2021-07406  Attorney for the Plaintiff or the Plaintiff Stephen Mark Rappoport  Address of the Plaintiff's Attorney or the Plaintiff RAPPOPORT DEGIOVANNI & CASLOW 989 WATERMAN AVENUE EAST PROVIDENCE RI 02914-1314					
Licht Judicial Complex Providence/Bristol County 250 Benefit Street Providence RI 02903 (401) 222-3250	Address of the Defendant  CLO OFFICE OF the Administrator  Rhode Island Division of Motor Vehicles  600 New London Ave  Cranston, R1 02920					

### TO THE DEFENDANT, KLLM Transport Services, LLC.:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

	This Summons was generated on 12/9/2021.	/s/ Stephen Burke	
I		Clerk	

Witness the seal/watermark of the Superior Court



## STATE OF RHODE ISLAND SUPERIOR COURT

Plaintiff Walter Machado et al. v.	Civil Action File Number PC-2021-07406
Jeremy Wood et al.  Defendant	

PROOF OF SERVICE
I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, KLLM Transport Services, LLC., by delivering or leaving said papers in the following manner:
☐ With the Defendant personally.
☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion  Address of dwelling house or usual place of abode
Age
Relationship to the Defendant
With an agent authorized by appointment or by law to receive service of process.  Name of authorized agent  If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.
☐ With a guardian or conservator of the Defendant.  Name of person and designation
☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation



## STATE OF RHODE ISLAND SUPERIOR COURT

I I a a a consistence of the constant of the c
Upon a private corporation, domestic or foreign:
☐ By delivering said papers to an officer or a managing or general agent.
Name of person and designation
☐ By leaving said papers at the office of the corporation with a person employed therein.
Name of person and designation
☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.
Name of authorized agent
If the agent is one designated by statute to receive service, further notice as required by statute was given
as noted below.
☐ I was unable to make service after the following reasonable attempts:
SERVICE DATE: SERVICE FEE \$
Month Day Year
Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE
1002/
SIGNATURE OF PERSON OTHER THAN A SHERIFF OF DEPUTY SHERIFF OF CONSTABLE MUST BE
NOTARIZED.
a de la constant de l
Signature
State of
County of
On this day of, 20 , before me, the undersigned notary public personally
, and the state of
personary known to the hotary
winch was
, to be the person who signed above in my presence,
and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.
N
Notary Public:
My commission expires:
Notary identification number:

Page 2 of 2

Jhf 02-10-17		
STATE OF RHODE ISLAND PROVIDENCE, SC		SUPERIOR COURT
WALTER MACHADO et al.	)	
VS.	)	C.A.NO: PC-2021-07406
JEREMY WOOD et al.	)	

### NOTICE OF SERVICE PURSUANT TO R.I.G.L. §31-7-7

Now comes Stephen M. Rappoprot, Esquire, and being under oath, does hereby swear and state as follows:

- 1. That I am the attorney for the Plaintiff(s) in the above-entitled action.
- 2. That on December 10, 2021, I caused a copy of the attached Summons and Complaint in the above-entitled matter to be served along with the statutory fee of Five (\$5.00) Dollars on the Administrator of the Division of Motor Vehicles, or in his or her office on someone acting on his or her stead as the Administrator of the Division of Motor Vehicles.
  - 3. I make this Affidavit in Compliance with R.I.G.L. §31-7-7(b).

Stephen M. Rappoport, Esq. #1250

State of Rhode Island County of Providence

Subscribed and sworn to before me this

day of Selfull 2021

ID 53728

Notary Public

Print Name: -

My Commission Expires:

Jhf 12-08-21

	SUPERIOR C					COURT		
	)		20					
9 9	)							
	)			C.A.NC	): PC-202	21-07L	tOlo	
	)		s	w.				
							SUPERIOR COURT  ) ) ) C.A.NO: PC-2021- 0 74	

#### COMPLAINT

Now come the Plaintiffs in the above-entitled cause and allege and say:

- 1. That the Plaintiffs Walter J. Machado and Kathy Machado are residents of the Town of Bristol, County of Providence, State of Rhode Island and are husband and wife at all times relevant hereto.
- 2. That the Defendant Jeremy Wood is a resident of the Town of Wesson, Copiah and Lincoln Counties, State of Mississippi over whom the State of Rhode Island may exercise its jurisdiction for the purpose of this claim pursuant to R.I.G.L. §31-7-6 as a non-resident who owned and/or operated a motor vehicle on a public highway in the State of Rhode Island.
- 3. That the KLLM Transport Services, LLC, Alias ABC Limited Liability Company (hereinafter referred to as "KLLM") is a limited liability company organized and existing under the laws of the State of Mississippi over whom the State of Rhode Island may exercise its jurisdiction for the purpose of this claim pursuant to R.I.G.L. §31-7-6 as a non-resident who owned and/or operated a motor vehicle on a public highway in the State of Rhode Island.
- 4. That on or about January 23, 2019 Plaintiff Walter J. Machado operated a motor vehicle in a northerly direction on Route 95 North just north of Service Avenue, a public highway in the City of Warwick, County of Kent, State of Rhode Island.
- 5. That at the same time and place Defendant Jeremy Wood negligently operated a tractor trailer owned by Defendant KLLM and as a result of said negligence, Defendants' tractor trailer struck Plaintiff's motor vehicle causing Plaintiff's motor vehicle to spin and strike the center concrete barrier with the passenger side of his vehicle.

- 6. That at all times relevant herein, Plaintiff Walter J. Machado was in the exercise of due care.
- 7. That as a direct and proximate result of Defendants Jeremy Wood and KLLM's negligence, Plaintiff Walter J. Machado sustained severe injuries and has suffered great pain of body and mind, Plaintiff has expended great sums of money for the medical care and treatment of said injuries, suffered a loss of earning capacity and Plaintiff Walter J. Machado has suffered great other damage and Plaintiff Kathy Machado has suffered a loss of her husband's consortium, services, society, affection, companionship, and relations, and both Plaintiffs have suffered other great damage.
- 8. That the amount claimed is sufficient to establish jurisdiction in the Superior Court.

WHEREFORE, Plaintiffs demand judgment against Defendants Jeremy Wood, Alias John Doe and KLLM Transport Services, LLC, Alias ABC Limited Liability Company, plus interest and costs.

Plaintiffs,

By their attorney,

Stephen M. Rappoport, Esq. #1250

Rappoport, DeGiovanni & Caslowitz, Inc.

989 Waterman Avenue

East Providence, RI 02914

(401) 437-3000

(401) 437-3037 (fax)

rap@rdclegal.com

**CERTIFICATION OF SERVICE** 

I, the undersigned, hereby certify that on the day of day of day of day of like this document electronically and it is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

odie H Federowicz

STATE OF RHODE ISLAND
PROVIDENCE, SC

WALTER J. MACHADO and
KATHY MACHADO

VS.

C.A.NO: PC-2021
JEREMY WOOD, Alias John Doe and

Jhf 12-08-21

KLLM TRANSPORT SERVICES, LLC, Alias ABC Limited Liability Company

### **DEMAND FOR JURY TRIAL**

Now come the Plaintiffs in the above-entitled matter and hereby demand a trial by jury.

Plaintiffs,

By their attorney,

Stephen M. Rappoport, Esq. #1250 Rappoport, DeGiovanni & Caslowitz, Inc. 989 Waterman Avenue East Providence, RI 02914

Stepren m ( Coppopul

(401) 437-3000 (401) 437-3037 (fax)

rap@rdclegal.com

CERTIFICATION OF SERVICE

I, the undersigned, hereby certify that on the day of day of day of and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

Jodie H. Federowicz